

# Exhibit E

IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA

MICHELLE GORE,

Plaintiff,

v.

NEW PRIME, INC., ACE AMERICAN  
INSURANCE COMPANY, and TYLER  
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

---

**ANSWER AND DEFENSES OF DEFENDANT ACE AMERICAN INSURANCE  
COMPANY TO PLAINTIFF’S COMPLAINT**

COME NOW ACE American Insurance Company (hereinafter “Defendant” or “this defendant”), named defendant in the above-styled action, and files the following Answer and Defenses to Plaintiff’s (“Complaint”), showing the Court as follows:

**FIRST DEFENSE**

The Complaint fails to set forth a claim against Defendant upon which relief can be granted.

**SECOND DEFENSE**

Plaintiff’s injuries, if any, were caused by an unforeseeable intervening third-party tortfeasor and / or the acts and failure to act of persons or entities other than Defendant.

**THIRD DEFENSE**

Defendant is not liable to Plaintiff because Defendant breached no duty owed to Plaintiff in regard to the occurrence giving rise to this Complaint.

**FOURTH DEFENSE**

Any injury allegedly suffered by Plaintiff was not proximately caused by Defendant.

**FIFTH DEFENSE**

Defendant is an improper defendant in this litigation. There is no basis for its inclusion as a party defendant, under Georgia's Direct Action Statute or otherwise.

**SIXTH DEFENSE**

Defendant reserves the right to plead and prove such other defenses as may become known during the course of investigation and discovery.

**SEVENTH DEFENSE**

As a Seventh Defense, Defendant answer the numbered paragraphs of the Complaint as follows:

**1.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 1 of the Complaint, and, therefore, cannot admit or deny same.

**2.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 2 of the Complaint, and, therefore, cannot admit or deny same.

**3.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 3 of the Complaint, and, therefore, cannot admit or deny same.

**4.**

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 4 of the Complaint, and, therefore, cannot admit or deny same.

**5.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 5 of the Complaint, and, therefore, cannot admit or deny same.

**6.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 6 of the Complaint, and, therefore, cannot admit or deny same.

**7.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 7 of the Complaint, and, therefore, cannot admit or deny same.

**8.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 8 of the Complaint, and, therefore, cannot admit or deny same.

**9.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 9 of the Complaint, and, therefore, cannot admit or deny same.

**10.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 10 of the Complaint, and, therefore, cannot admit or deny same.

**11.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 11 of the Complaint, and, therefore, cannot admit or deny same.

**12.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 12 of the Complaint, and, therefore, cannot admit or deny same.

**13.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 13 of the Complaint, and, therefore, cannot admit or deny same.

**14.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 14 of the Complaint, and, therefore, cannot admit or deny same.

**15.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 15 of the Complaint, and, therefore, cannot admit or deny

same.

**16.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 16 of the Complaint, and, therefore, cannot admit or deny same.

**17.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 17 of the Complaint, and, therefore, cannot admit or deny same.

**18.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 18 of the Complaint, and, therefore, cannot admit or deny same.

**19.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 19 of the Complaint, and, therefore, cannot admit or deny same.

**20.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 20 of the Complaint, and, therefore, cannot admit or deny same.

**21.**

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 21 of the Complaint, and, therefore, cannot admit or deny same.

**22.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 22 of the Complaint, and, therefore, cannot admit or deny same.

**23.**

Defendants reallege and reincorporates each response and defenses as if fully restated.

**24.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 24 of the Complaint, and, therefore, cannot admit or deny same.

**25.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 25 of the Complaint, and, therefore, cannot admit or deny same.

**26.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 26 of the Complaint, and, therefore, cannot admit or deny same.

**27.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 27 of the Complaint, and, therefore, cannot admit or deny

same.

**28.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 28 of the Complaint, and, therefore, cannot admit or deny same.

**29.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 29 of the Complaint, and, therefore, cannot admit or deny same.

**30.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 30 of the Complaint, and, therefore, cannot admit or deny same.

**31.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 31 of the Complaint, and, therefore, cannot admit or deny same.

**32.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 32 of the Complaint, and, therefore, cannot admit or deny same.

**33.**

Defendant is without information or knowledge sufficient to form a belief as to the



allegations contained in Paragraph No. 33 of the Complaint, and, therefore, cannot admit or deny same.

**34.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 34 of the Complaint, and, therefore, cannot admit or deny same.

**35.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 35 of the Complaint, and, therefore, cannot admit or deny same.

**36.**

Defendant denies the allegations contained in Paragraph No. 36 of the Complaint.

**37.**

Defendant admits it issued an excess liability to Defendant New Prime. Defendant is without information or knowledge sufficient to form a belief as to the allegations remained in Paragraph No. 37 of the Complaint, and, therefore, cannot admit or deny same.

**38.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 38 of the Complaint, and, therefore, cannot admit or deny same.

**39.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 39 of the Complaint, and, therefore, cannot admit or deny

same.

**40.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 40 of the Complaint, and, therefore, cannot admit or deny same.

**41.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 41 of the Complaint, and, therefore, cannot admit or deny same.

**42.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 42 of the Complaint, and, therefore, cannot admit or deny same.

**43.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 43 of the Complaint, and, therefore, cannot admit or deny same.

**44.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 44 of the Complaint, and, therefore, cannot admit or deny same.

**45.**

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 45 of the Complaint, and, therefore, cannot admit or deny same.

**46.**

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 46 of the Complaint, and, therefore, cannot admit or deny same.

**47.**

Defendants deny the allegations contained in Paragraph No. 47 of the Complaint.

**48.**

Defendants deny the allegations contained in Paragraph No. 48 of the Complaint.

**49.**

Any allegations contained in Plaintiff's Complaint not herein responded to by number, including Plaintiff's *ad damnum* clause, and its subparts are hereby denied.

WHEREFORE, having fully answered, Defendants pray the Complaint be dismissed with costs of this action cast against Plaintiffs.

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.  
ELIZABETH L. BENTLEY, ESQ.  
State Bar No.: 828730  
[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)  
*Attorney for the Defendant*

**SWIFT, CURRIE, McGHEE & HIERS, LLP**  
1420 Peachtree Street NE, Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800 Phone  
(470) 600-5990 Fax

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v.

NEW PRIME, INC., ACE AMERICAN  
INSURANCE COMPANY, and TYLER  
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

---

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing *Answer and Defenses of ACE American* via Electronic Mail and via the Odyssey E-File and Serve System which will automatically send an electronic copy of same to all counsel and parties of record as follows:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
PO Box 57007  
Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)  
*Attorneys for the Plaintiff*

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorney for the Defendant*

SWIFT, CURRIE, McGHEE & HIERS, LLP  
1420 Peachtree Street NE, Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800 Phone  
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LEE COOPER,

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Civil Action File No. 23-EV-001543

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**DEFENDANT ACE AMERICAN INSURANCE COMPANY'S**  
**DEMAND FOR JURY PANEL OF TWELVE**

COME NOW ACE American Insurance Company (hereinafter "Defendant" or "this defendant"), named defendant in the above-styled action, by and through his attorneys, and demands in writing prior to the commencement of the trial term that the above-styled case be tried by a jury of twelve, pursuant to O.C.G.A. § 15-12-122.

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorney for the Defendant*

**SWIFT, CURRIE, McGHEE & HIERS, LLP**

1420 Peachtree Street NE, Suite 800

Atlanta, Georgia 30309

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IN THE STATE COURT OF FULTON COUNTY  
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NEW PRIME, INC., ACE AMERICAN  
INSURANCE COMPANY, and TYLER  
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing ***Defendant Ace American Insurance Company's Demand for Jury Panel of Twelve*** upon all parties via the Odyssey E-File and Serve System which will electronically send an electronic copy of same to the following counsel and parties of record:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
PO Box 57007  
Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)  
***Attorneys for the Plaintiff***

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.  
ELIZABETH L. BENTLEY, ESQ.  
State Bar No.: 828730  
[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)  
***Attorney for the Defendant***

**SWIFT, CURRIE, McGHEE & HIERS, LLP**  
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IN THE STATE COURT OF FULTON COUNTY  
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MICHELLE GORE,

Plaintiff,

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NEW PRIME, INC., ACE AMERICAN  
INSURANCE COMPANY, and TYLER  
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

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**ANSWER AND DEFENSES OF DEFENDANT NEW PRIME, INC.  
AND TYLER LEE COOPER**

COME NOW New Prime, Inc. and Tyler Cooper (hereinafter “Defendants” or “this defendant”), named defendants in the above-styled action, and file the following Answer and Defenses to Plaintiff’s (“Complaint”), showing the Court as follows:

**FIRST DEFENSE**

The Complaint fails to set forth a claim against Defendants upon which relief can be granted.

**SECOND DEFENSE**

Plaintiff’s injuries, if any, were caused by an unforeseeable intervening third-party tortfeasor and / or the acts and failure to act of persons or entities other than Defendants.

**THIRD DEFENSE**

Defendants are not liable to Plaintiff because Defendants breached no duty owed to Plaintiff in regard to the occurrence giving rise to this Complaint.

**FOURTH DEFENSE**

Any injury allegedly suffered by Plaintiff was not proximately caused by Defendants.

**FIFTH DEFENSE**

Service of process was insufficient as to Defendant Cooper and he should therefore be dismissed from this litigation.

**SIXTH DEFENSE**

Defendants reserve the right to plead and prove such other defenses as may become known during the course of investigation and discovery.

**SEVENTH DEFENSE**

As a Seventh Defense, Defendants answer the numbered paragraphs of the Complaint as follows:

**1.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 1 of the Complaint, and, therefore, cannot admit or deny same.

**2.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 2 of the Complaint, and, therefore, cannot admit or deny same.

**3.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 3 of the Complaint, and, therefore, cannot admit or deny same.



**4.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 4 of the Complaint, and, therefore, cannot admit or deny same.

**5.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 5 of the Complaint, and, therefore, cannot admit or deny same.

**6.**

Defendant admit the allegations contained in Paragraph No. 6 of the Complaint.

**7.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 7 of the Complaint, and, therefore, cannot admit or deny same.

**8.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 8 of the Complaint, and, therefore, cannot admit or deny same.

**9.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 9 of the Complaint, and, therefore, cannot admit or deny same.

**10.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 10 of the Complaint, and, therefore, cannot admit or deny same.

**11.**

Defendants admit Defendant Lee was driving a 2019 Freightliner tractor-trailer on its behalf when the collision occurred, but are without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 11 of the Complaint, and, therefore, cannot admit or deny same.

**12.**

Defendants admit the allegations contained in Paragraph No. 8 of the Complaint.

**13.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 13 of the Complaint, and, therefore, cannot admit or deny same.

**14.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 14 of the Complaint, and, therefore, cannot admit or deny same.

**15.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 15 of the Complaint, and, therefore, cannot admit or deny same.

**16.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 16 of the Complaint, and, therefore, cannot admit or deny same.

**17.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 17 of the Complaint, and, therefore, cannot admit or deny same.

**18.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 18 of the Complaint, and, therefore, cannot admit or deny same.

**19.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 19 of the Complaint, and, therefore, cannot admit or deny same.

**20.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 20 of the Complaint, and, therefore, cannot admit or deny same.

**21.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 21 of the Complaint, and, therefore, cannot admit or deny

same.

**22.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 22 of the Complaint, and, therefore, cannot admit or deny same.

**23.**

Defendants reallege and reincorporates each response and defenses as if fully restated.

**24.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 24 of the Complaint, and, therefore, cannot admit or deny same.

**25.**

Defendant admit the allegations contained in Paragraph No. 25 of the Complaint.

**26.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 26 of the Complaint, and, therefore, cannot admit or deny same.

**27.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 27 of the Complaint, and, therefore, cannot admit or deny same.

**28.**

Defendants are without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 28 of the Complaint, and, therefore, cannot admit or deny same.

**29.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 29 of the Complaint, and, therefore, cannot admit or deny same.

**30.**

Defendants deny the allegations contained in Paragraph No. 30 of the Complaint.

**31.**

Defendants deny the allegations contained in Paragraph No. 31 of the Complaint.

**32.**

Defendants deny the allegations contained in Paragraph No. 32 of the Complaint.

**33.**

Defendants deny the allegations contained in Paragraph No. 33 of the Complaint.

**34.**

Defendants deny the allegations contained in Paragraph No. 34 of the Complaint.

**35.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 35 of the Complaint, and, therefore, cannot admit or deny same.

**36.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 36 of the Complaint, and, therefore, cannot admit or deny

same.

**37.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 37 of the Complaint, and, therefore, cannot admit or deny same.

**38.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 38 of the Complaint, and, therefore, cannot admit or deny same.

**39.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 39 of the Complaint, and, therefore, cannot admit or deny same.

**40.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 40 of the Complaint, and, therefore, cannot admit or deny same.

**41.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 41 of the Complaint, and, therefore, cannot admit or deny same.

**42.**

Defendants are without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 42 of the Complaint, and, therefore, cannot admit or deny same.

**43.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 43 of the Complaint, and, therefore, cannot admit or deny same.

**44.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 44 of the Complaint, and, therefore, cannot admit or deny same.

**45.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 45 of the Complaint, and, therefore, cannot admit or deny same.

**46.**

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 46 of the Complaint, and, therefore, cannot admit or deny same.

**47.**

Defendants deny the allegations contained in Paragraph No. 47 of the Complaint.

**48.**

Defendants deny the allegations contained in Paragraph No. 48 of the Complaint.

49.

Any allegations contained in Plaintiff's Complaint not herein responded to by number, including Plaintiff's *ad damnum* clause, and its subparts are hereby denied.

WHEREFORE, having fully answered, Defendants pray the Complaint be dismissed with costs of this action cast against Plaintiffs.

Dated this 14<sup>th</sup> day of August, 2023.

Respectfully submitted by,  
**SWIFT, CURRIE, McGHEE & HIERS, LLP**

*/s/ Elizabeth L. Bentley*

---

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorney for Defendants*

**Swift, Currie, McGhee & Hiers, LLP**  
1420 Peachtree Street NE, Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800 Phone  
(404) 888-6199 Fax



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I hereby certify that I have this day served a copy of the foregoing *Answer and Defenses of New Prime and Tyler Cooper* via Electronic Mail and via the Odyssey E-File and Serve System which will automatically send an electronic copy of same to all counsel and parties of record as follows:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
PO Box 57007  
Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)  
*Attorneys for the Plaintiff*

Dated this 14<sup>th</sup> day of April, 2023.

Respectfully submitted by,  
**SWIFT, CURRIE, McGHEE & HIERS, LLP**

*/s/ Elizabeth L. Bentley*

---

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorney for Defendants*

4875-1455-3437, v. 1

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**DEFENDANTS NEW PRIME AND TYLER COOPER'S**  
**DEMAND FOR JURY PANEL OF TWELVE**

COME NOW New Prime, Inc. and Tyler Cooper (hereinafter "Defendants" or "this defendant"), named defendants in the above-styled action, by and through their attorneys, and demand in writing prior to the commencement of the trial term that the above-styled case be tried by a jury of twelve, pursuant to O.C.G.A. § 15-12-122.

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)

*Attorney for the Defendants*

**SWIFT, CURRIE, McGHEE & HIERS, LLP**

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(404) 874-8800 Phone

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I hereby certify that I have this day served a copy of the within and foregoing ***Defendants New Prime and Tyler Cooper's Demand for Jury Panel of Twelve*** upon all parties via the Odyssey E-File and Serve System which will electronically send an electronic copy of same to the following counsel and parties of record:

Thomas Rainey, Esq.  
MORGAN & MORGAN ATLANTA PLLC  
PO Box 57007  
Atlanta, GA 30343  
[trainey@forthepeople.com](mailto:trainey@forthepeople.com)  
***Attorneys for the Plaintiff***

Respectfully submitted this 14<sup>th</sup> day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.  
ELIZABETH L. BENTLEY, ESQ.  
State Bar No.: 828730  
[beth.bentley@swiftcurrie.com](mailto:beth.bentley@swiftcurrie.com)  
***Attorney for the Defendant***

**SWIFT, CURRIE, McGHEE & HIERS, LLP**  
1420 Peachtree Street NE, Suite 800  
Atlanta, Georgia 30309  
(404) 874-8800 Phone  
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